

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION

OWL SHIPPING LLC	§	
	§	
Plaintiff,	§	
	§	
v.	§	C.A. NO 3:24-cv-00270
	§	Admiralty - Rule 9(h)
DALIAN SUNTIME INTERNATIONAL	§	
TRANSPORTATION CO., LTD. A/K/A	§	
DALIAN SUNTIME INT'L	§	
TRANSPORTATION CO. LTD. A/K/A	§	
DALIAN SUNTIME INTERNATIONAL	§	
TRANSPORTATION COMPANY, LTD.	§	
A/K/A DALIAN SUNTIME	§	
INTERNATIONAL TRANSPORTATION	§	
COMPANY LIMITED	§	
	§	
Defendants.	§	

VERIFIED ANSWER OF GARNISHEE TPCO ENTERPRISE, INC. TO WRIT OF  
ATTACHMENT

Garnishee TPCO, ENTERPRISE INC. ("TPCO"), respectfully submits its Verified Answer to Scorpio Ultramax Pool Ltd. ("Scorpio") and SBI Chartering and Trading Ltd ("SBI") Maritime Writ of Attachment and Garnishment (Dkt. 8) pursuant to the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions ("Supplemental Rules") B(3)(a).

TPCO was served by the United States Marshal with a Writ of Garnishment on September 25, 2014 (Dkt. 32) at the instance of Scorpio and SBI. TPCO has no property of Dalian Suntime International Transportation Co., Ltd. ("Dalian") in its possession custody or control.

The cargo shipped on board M/V INTER PRIDE under bills of lading issued Nos. DGIA1401IPTJ12 – DGIA1401IPTJ15 and DGIA1401IPTJ39 (the "Bills of Lading"), copies of which are attached to the Declaration of Chi Chiu Lam (Dkt. 39-2 – Dkt. 39-6), is the property of

TPCO. Said cargo was shipped “Freight Prepaid” and no freight is due to the carrier or anyone else for such carriage. (*Id.*) (A copy of the Declaration of Chi Chiu Lam is also attached hereto).

DATED: Oct. 29, 2014

/s/ *J. C. Winton*

James C. Winton  
S.D. TX No. 10697  
State Bar No. 21797950  
Erika J. Lindberg  
S.D. TX. No. 2129627  
State Bar No. 24090231  
811 Main Street, Suite 1100  
Houston, Texas 77002  
(713) 646-1304  
(713) 751-1717 (Facsimile)  
jwinton@bakerlaw.com  
elindberg@bakerlaw.com

Attorneys for TPCO ENTERPRISE, INC.

CERTIFICATE OF SERVICE

I certify that the foregoing was served on all counsel of record via the Court's CM/ECF system at the time of filing.

/s/ *J. C. Winton*  
James C. Winton